

essential for a proper understanding of the disclosed invention are all already shown in the drawings and no further correction is required.

The objection to the drawing in paragraph 3 of the Office Action is traversed as item 26, which is the reinforcement, is already shown in the drawings. Applicants apologize for the informal nature of the drawings which has no doubt resulted in some of the objections by the Examiner. It is respectfully requested that corrections agreed to by the Applicant above to the drawings be deferred until such time as the case is ready for allowance. The presentation of formal drawings will readily illustrate the placement of the reinforcement 26 as an intermediate layer.

The objection to the specification in paragraph 4 of the Office Action is traversed in that the new application transmittal form submitted together with the Application in paragraph 9 already made a request that the Application be amended to add the sentence, "This Application claims the benefit of U.S. Provisional Application No. 60/081,711 filed April 14, 1998" before the first line of the specification on the first page. Accordingly, this has already been requested and if it needs to be done again, then the Applicants respectfully request the Examiner to enter such a line into the first page of the specification at the beginning, as previously informally requested by the Applicants, by way of an Examiner's amendment.

The title has been changed along the lines suggested by the Examiner in paragraph 5 of the Office Action.

The trademark VITON has been capitalized where it is used in the specification as noted by the Examiner in paragraph 6 of the Office Action.

The abstract has been revised in conformance with the objections raised by the Examiner in paragraphs 7 and 8 of the Office Action.

The objections to the claims based on objections to the specification indicated by the Examiner in paragraphs 9 and 10 of the Office Action are respectfully traversed. The specification on page 3, line 17, indicates that a coiled tubing reel carries a continuous length of tubing 20, at least a portion of which is preferably made from a perforated material as shown in Figure 4. The specification clearly indicates that the preferred embodiment has perforations intended to be an integral part of a coiled tubing assembly on a reel 10. The desired location in the wellbore is where the production is to occur. The segments can be attached to the bottom of a coiled tubing string or in different locations depending upon where the production will occur. As stated in the specification page 4 beginning line 9, the perforated section can be only a portion of the coiled tubing string 20 and the segment of the coiled tubing string which is referred to as 12 can be as long as the finished coiled length of the tubing 20 with openings placed at desired locations. The segment is not wrapped around the tubing because it would not work in that manner (unless the tubing is perforated) as the tubing would obstruct the openings as indicated by the Examiner.

The Examiner refers to an embodiment where the coiled tubing string 20 is perforated with openings 14 and gravel packed in a traditional manner. The presence of this alternative embodiment should not be a cause of confusion, as the first embodiment discussed in the specification makes it clear that segments 12 form a part of the coiled tubing assembly and can be disposed where needed to allow certain zones to be produced.

The reinforcement refers to the grid 26 which is referred to in the specification page 4, line 18, to provide a support off of tube 20 for the open cell filter media 28. This reinforcement is shown in the figures and described in the specification as being in between the tube 20 and the open cell filter media 28.

It is respectfully submitted that with the above explanation and references to the specification that any uncertainties the Examiner might have as to the described embodiments should now be addressed. It is respectfully submitted that the formal rejections of the specification now be withdrawn.

The reference relied upon by the Examiner to reject claims 1, 2, 6, 8, 9, 14 and 17 as being anticipated is the Donnelly reference. Donnelly shows in figure 1 a perforated carrier tube 3 surrounded by filter sheets 4 and in turn surrounded by a slotted protective tube 5. The specification in column 5, line 29, indicates that instead of using a plurality of filter sheets which partially surround the carrier tube 3, a single scrolled filter sheet can be used which is not secured. The expanded view as shown in figure 2 illustrating the outer slotted tube 5 to be still be in place and up against the formation. Figure 6 shows an alternative embodiment where a coiled tubing string 13 carries the expander 12 which has openings 15. A tube with openings 14 is inserted and material is then delivered through the coiled tubing 13 through the openings 15 and into the openings of the expanded tube. Wipers 16 press the delivered material into the openings so as to constitute a filter assembly. Donnelly doesn't use a stretchable material which is why he has to use the overlapping sheets or the loose scroll. He relies on relative movement of screen on screen to get his expansion. This can subject the screen sectors to tearing on expansion.

The Examiner has overlooked that claim 2 requires a protective cover for the filter assembly which is removable downhole. This feature is not to be found in the Donnelly reference which teaches the exact opposite.

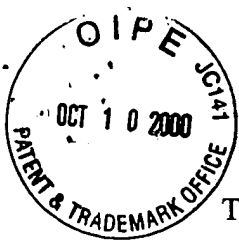
With regard to claim 5, the Examiner combines Donnelly with Uban, claiming that Uban teaches the reinforcement between the body and the filter assembly. Uban is not an expandable

construction. What is being claimed in claim 5 is an expandable construction involving a reinforcement. To emphasize this fact, claim 5 has been further amended to indicate that the reinforcement is expandable with the body and the filter assembly. The non-expandable reinforcement of Uban, if combined with Donnelly, would result in an inoperative embodiment which would not be able to expand. Accordingly, the obviousness rejection of claim 5 is respectfully traversed.

Returning to claim 1, it can be seen that this claim has been amended to indicate that the perforated body is not only made from an expandable material, but further comprises a stretchable filter assembly secured to it. This was discussed in the specification (page 6, line 24). The Donnelly reference requires relative movement of screen on screen because Donnelly's screen is not stretchable.

Claim 14 has been similarly amended to track the language of claim 1 as amended. For the reasons claim 1 is allowable, claim 14 is also allowable as a method. Since the filter material is stretchable, there will not be any problems of relative movement as would be possible in running Donnelly's design.

With regard to apparatus claim 9, the Donnelly reference does not disclose the construction of tube 3 from a flat member which is rolled into a tube with a sealed longitudinal joint. Claim 9 refers to the segment which is a part of the perforated body which in turn would correspond to item 3 in Donnelly. Item 3 in Donnelly is not described anywhere as being constructed in the manner shown and claimed in claim 9.



The remarks of the Applicants directed to specific apparatus claims are equally intended to apply to counterpart method claims. For example, the removable downhole feature of claim 2 is found in claim 16, which is a method claim.

It is respectfully submitted that all of the claims are now in condition for allowance over the cited art and such action is respectfully requested.

Respectfully submitted,

October 5, 2000

Richard T. Redano

Richard T. Redano
Registration No. 32,292
DUANE, MORRIS & HECKSCHER, LLP
One Greenway Plaza, Suite 500
Houston, Texas 77046
Telephone: (713) 552-9900
Fax: (713) 552-0109

CERTIFICATE OF MAILING 37 CFR 1.8(a)

I hereby certify that this correspondence along with any referred to as attached or enclosed is being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231, on October 5, 2000.

Tracie Thigpen

Tracie Thigpen

RECEIVED
OCT 12 2000
TC3600 MAIL ROOM